

# Lennon Telephone Company

## Annual 47 CFR 64.2009(e) CPNI Certification EB Docket No. 06-36

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Suite TW-A325  
Washington, D.C. 20554

**Re: Annual CPNI Compliance Certificate  
Lennon Telephone Company & Total Communications Systems, Inc.  
Form 499 Filer ID Number(s): 808254 & 818834**


Dear Secretary Dortch,

In accordance with 47 CFR 64.2009(e), please find attached the Company's Annual Compliance Certificate for the previous calendar year, 2015. The Compliance Certificate includes the Company's:

- Statement explaining how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

If you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

  
Jacqueline Bowden  
President

2.22.2016  
Date

Enclosure  
cc via e-mail: Best Copy and Printing, Inc., [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)

# **CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES**

## **Including:**

**Statement Explaining How Operating Procedures Ensure Regulatory Compliance**

**Explanation of Any Actions Against Data Brokers, and**

**Summary of all Customer Complaints Received**

Jacqueline Bowden signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Lennon Telephone Company & Total Communications Systems, Inc. (Companies), related to the previous calendar year, 2015.

This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide:

- A "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

## **On Behalf Of The Company, I Certify As Follows:**

1. I am the President of the Companies, I am an officer of the Companies, and I am acting as an agent of the Companies. My business address is P.O. Box 329, Lennon, Michigan 48449. The Company's Form 499 Filer ID is 808254 & 818834.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to CPNI, 47 CFR 64.2001 *et seq.*

## **Statement Explaining How Operating Procedures Ensure Regulatory Compliance**

3. I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the FCC's regulations governing CPNI.

4. The Companies ensure that they are compliance with the FCC's CPNI regulations. The Companies train their personnel regarding when they are authorized to use CPNI, when they are not authorized to use CPNI, and how to safeguard CPNI. The Companies maintain a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for any changes in law relating to CPNI. The CPNI Manual contains key all essential information and forms to ensure the Company's compliance with CPNI regulations.



5. The Companies have established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

6. The Companies personnel make no decisions regarding CPNI without first consulting with management.

7. The Companies have an express disciplinary process in place for personnel who make unauthorized use of CPNI.

8. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Companies likewise maintain records of its affiliates' sales and marketing campaigns that use CPNI. The Companies also maintain records of all instances where CPNI were disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Companies maintain these records in their offices for a minimum of one year.

9. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

10. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Companies will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

11. The Companies maintain records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

12. The Companies train their personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters." In-store visits require valid photo identification.

13. The Companies, on an ongoing basis, review changes in law affecting CPNI, and updates and trains companies personnel accordingly.

**Explanation of Actions Against Data Brokers**

14. The Companies have not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

**Summary of all Customer Complaints Received**

15. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.

16. The Companies do not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.

The companies represent and warrant that this certification is consistent with 47 CFR 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Date: 2.22.16

Jaqueline Bowden